

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

§  
§  
§  
§

**v.**

**Case No. 4-14-cr-00090**

**ROBERT GEORGE ARWADY  
RICHARD PAUL MEDRANO**

§  
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§

**DEFENDANTS' RULE 55.2 NOTICE AND  
OBJECTIONS TO GOVERNMENT'S TRIAL EXHIBITS**

TO THE HONORABLE KEITH P. ELLISON,  
UNITED STATES DISTRICT JUDGE:

NOW COME the defendants Robert George Arwady and Richard Paul Medrano, by and through their counsel, and files this Notice, pursuant to Local Rule 46, Criminal Local Rule 55.2, and this Court's Procedures 12(B) and 12(C), Objections to the Government's Trial Exhibits, showing for cause as follows:

On October 14, 2015, the Government produced its exhibit list (Exhibit Nos. 1-16) and witness list (2 witnesses). Pursuant to this Local Rule 46, Local Criminal Rules 55.2A and 55.2, and this Court's Procedures 12(B) and 12(C), the defense provides the following notice to the Court and Government<sup>1</sup>:

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<sup>1</sup> The defense will work in good faith with the government prior to voir dire on October 20, 2015, to determine whether an agreement can be reached on these objections.

**1. Notice under CrLR 55.2.A & Court Procedure 12.B.**

Defendants object to the authenticity of exhibits 2, 3, 4, 8, 9, 10, 11, 12, 14 and 15.

Defendants object to their authenticity under Rule 901 and they are not self-authenticating under Rule 902.

**2. Notice under CrLR 55.2.B & Court Procedure 12.C.**

The defense also notes the following admissibility objections:

Exhibits 2, 3, 4, 8, 9, 10, 11, 12, 14 and 15 contain hearsay and handwriting of unknown origin.

Respectfully submitted,

FLOOD & FLOOD

/s/ Charles Flood

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**Attorney for Richard P. Medrano (2)**

/s/ Joseph Grant

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**Attorneys for Robert G. Arwady (1)**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 16, 2015, I electronically filed the foregoing document with the Clerk of Court using CM/ECF system which will send notification of such filing to all filing users.

*/s/ Charles Flood*

Charles Flood